

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION**

Dallas Mudd,

Plaintiff,

v.

National Labor Relations Board, et al.,

Defendants.

Civil Action No. 4:24-cv-01055-O

**MOTION FOR A PRELIMINARY INJUNCTION AND TO CONSOLIDATE A
HEARING ON THE PRELIMINARY INJUNCTION WITH A TRIAL ON THE
MERITS**

Pursuant to Federal Rule of Civil Procedure 65, Plaintiff Dallas Mudd moves this Court to issue a preliminary injunction and to consolidate a hearing on the preliminary injunction with a trial on the merits. Given this case presents only legal issues, the Court may issue final judgment in lieu of preliminary relief. This Motion is supported by a Memorandum of Points and Authorities.

November 4, 2024

/s/ Aaron Solem

Aaron Solem (admitted *pro hac vice*)
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Attorney for Plaintiff Dallas Mudd

CERTIFICATE OF CONFERENCE

I conducted a conference with Dawn Goldstein, Paul Thomas, Kevin Flanagan, David Boehm, and Kent Coupe of the NLRB by email on November 1 and 4, 2024, regarding the relief sought herein. No agreement could be reached because the NLRB opposes the injunction sought and opposes consolidating a hearing on the motion with a trial on the merits.

/s/ Aaron Solem
Aaron Solem

CERTIFICATE OF SERVICE

I filed this motion with the Court via ECF. Defendants have not filed their notice of appearance but have agreed to service by email. Today, November 4, 2024, I emailed a copy of the motion to NLRB counsel listed below:

Dawn Goldstein
Paul Thomas
Kent Coupe
Kevin Flanagan
David Boehm
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/s/ Aaron Solem
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